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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**
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11 EDWARD L. SCHECHTER,

12 Plaintiff,

13 vs.

14 UNUM LIFE INSURANCE
COMPANY OF AMERICA and Does
15 1-10,

16 Defendants.
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Case No.: 08 CV 459 WQH LSP

[Hon. William Q. Hayes]

JOINT MOTION AND STIPULATION
TO EXTEND TIME FOR RESPONSE
TO COMPLAINT AND [PROPOSED]
ORDER THEREON

[Local Rules 7.2 and 12.1]

Disc. C/O: Not Set
Motion C/O: Not Set
Trial Date: Not Set

STIPULATION

WHEREAS, Plaintiff Edward L. Schechter ("Plaintiff") filed his Complaint in the above-entitled Court on March 12, 2008;

WHEREAS, on March 20, 2008, Defendant Unum Life Insurance Company of America ("Unum Life") was served with the Complaint in this action;

WHEREAS, Unum Life's response to the Complaint is currently due on April 9, 2008;

WHEREAS, on April 7, 2008, Plaintiff's granted Unum Life's request for a 14-day extension to file and serve its response to the Complaint, subject to Court approval;

WHEREAS, Unum Life contends good cause exists for the requested the 14-day extension of time in which to file a response because its counsel needs additional time to review the files relating to this matter, to evaluate Plaintiff's claims and allegations and to prepare a meaningful response to the Complaint.

NOW THEREFORE, SUBJECT TO COURT APPROVAL, IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES THROUGH THEIR UNDERSIGNED ATTORNEYS OF RECORD, that UNUM LIFE shall have a 14-day extension of time in which to respond to the Complaint — *i.e.*, up to and including April 23, 2008.

1 IT IS SO STIPULATED.

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3 Dated: April 7, 2008

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10 Dated: April __, 2008

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LEVINE, STEINBERG, MILLER &
HUVER

By: 

HARRIS T. STEINBERG
Attorneys for Plaintiff
Edward L. Schechter

BARGER & WOLEN LLP

By: _____

SANDRA T. WEISHART
Attorneys for Defendant
Unum Life Insurance Company

1 IT IS SO STIPULATED.
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3 Dated: April __, 2008
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LEVINE, STEINBERG, MILLER &
HUVER

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6 By: HARRIS I. STEINBERG
Attorneys for Plaintiff
Edward L. Schechter
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9 Dated: April 8, 2008
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BARGER & WOLEN LLP

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12 By: 
SANDRA I. WEISHART
Attorneys for Defendant
Unum Life Insurance Company
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PROOF OF SERVICE

Edward L. Schechter v. Unum Life Insurance Company of America
USDC NO. 08 CV 459 WQJ LSP

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: Barger & Wolen LLP, 515 South Flower Street, 34th Floor, Los Angeles, California 90071.

On **April 8, 2008**, I served the foregoing document(s) described as JOINT MOTION AND STIPULATION TO EXTEND TIME FOR RESPONSE TO COMPLAINT AND [PROPOSED] ORDER on the interested parties in this action by placing [] the original [X] a true copy thereof enclosed in sealed envelope addressed as stated in the mailing list below.

Harris I. Steinberg, Esq.
Levine, Steinberg, Miller & Huver
550 West C. Street, Suite 1810
San Diego, CA 92101

[X] BY MAIL

[X] I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

[X] **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.
Executed at Los Angeles, California on **April 8, 2008**.

Sonia Martinez
(Name)


(Signature)